

REMARKS

I. Amendment to the Specification

In response to the request made in the Office Action, Applicants have amended the specification to update the status of the application listed in the specification.

II. 35 U.S.C. § 102(e) Rejections

Independent Claims 1, 10, and 13 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,890,169 to Wong et al. and also by U.S. Patent No. 6,000,023 to Jeon. These claims recite elements that relate to having file system structures of two different file systems in the same partition in a memory device. To clarify these claims, Applicants have amended independent Claims 1, 10, and 13 to specify that one of the file systems comprises a FAT file system and the other comprises a file system other than a FAT file system. In view of these amendments and the remarks below, Applicants respectfully request reconsideration and withdrawal of these rejections.

A. Independent Claims 1, 10, and 13 Are Patentable Over Wong et al.

Wong et al. teaches a disk fragmentation reduction technique for memory devices storing two or more *FAT file systems*. Every passage in Wong et al. cited in the Office Action makes clear that two or more *FAT file systems* are used, as shown in the chart below (emphasis added).

Abstract	"A combined file allocation table file system (CFAT file system) uses <i>two or more FAT file systems</i>")
Figure 6	("FAT File System B," "FAT File System C")
Col. 7, lines 24-27	"An embodiment of the present invention uses <i>two or more FAT file systems</i>"
Col. 7, lines 38-43	"a Large <i>FAT file system</i> . . . a Small <i>FAT file system</i> "
Col. 12, lines 29-63	"a Large <i>FAT file system</i> . . . a Small <i>FAT file system</i> "

In contrast, each of the independent claims recites that one of the file systems comprises a FAT file system and the other comprises a file system other than a FAT file system. Because Wong et al. merely teaches two or more *FAT file systems* and the independent claims require one of the file systems to be other than a FAT file system, Applicants respectfully submit that independent Claims 1, 10, and 13 and their dependent claims are patentable over Wong et al.

Applicants also note that, in its discussion of dependent Claims 16-18, which contained elements similar to those added into the independent claims in this Amendment, the Office Action asserted that Wong et al. intended their invention to be applied to both FAT and non-FAT file systems and cited col. 2, lines 35-54 for support of that proposition. Applicants respectfully disagree. All of the file systems listed in col. 2, lines 35-54 are FAT file systems. In fact, col. 2, lines 35-54 explicitly state that the listed file systems “are examples of FAT file systems that are available commercially.” Accordingly, contrary to the assertion made in the Office Action, the cited passage does not show that Wong et al. intended their invention to be applied to non-FAT file systems.

B. Independent Claims 1, 10, and 13 Are Patentable Over Jeon

In Jeon, two partitions overlap one another, and each partition contains file system structures. In the Office Action, it was asserted that the file system structures of the second partition exist in the region that overlaps the first partition, and, accordingly, that the first partition contains two file system structures — that of the first partition and that of the second partition (in the overlap region). However, Jeon makes clear that the file system structures in each partition are for the *same* file system. See col. 2, lines 54-57 (“Each of the partition blocks has a boot sector, FAT (file allocation table) and data storage areas.”) and col. 4, line 66 – col. 5, line 1 (“Similarly [sic] to first partition block 30, second partition block 32 has the boot sector,

FAT and root directory which are related to an operating system installed therein”). A boot sector, FAT, and root directory are characteristic file system structures of a FAT file system. Accordingly, even if Jeon teaches a single partition that contains two sets of file system structures, those file system structures are for the *same* file system — the FAT file system.

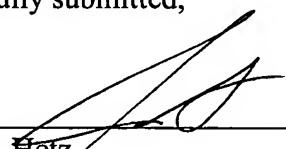
In contrast, amended independent Claims 1, 10, and 13 now recite that the file system structures in the single partition are for *different* file systems; specifically, for a FAT file system and a non-FAT file system. This feature is not shown in Jeon and provides advantages not contemplated by Jeon. As discussed in Applicants’ specification, by storing file system structures for different file systems in the same partition of a memory device, the memory device can be read by a larger number of media readers. For example, if a partition contains one set of file system structures for the FAT file system and another set of file system structures for a proprietary file system, the memory device can be read by readers using the prominent FAT file system as well readers using the lesser-known proprietary file system. In contrast, since only file system structures for the FAT file system are stored in Jeon, its memory device can only be read by readers using the FAT file system.

III. Conclusion

Because neither Wong et al. nor Jeon teaches having file system structures of two different file systems in the same partition in a memory device, with one of the file systems being a FAT file system and the other being other than a FAT file system, Applicants respectfully submit that independent Claims 1, 10, and 13 and their dependent claims are patentable over the cited references. If there are any questions concerning this Amendment, the Examiner is invited to contact the undersigned attorney at (312) 321-4719.

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Respectfully submitted,



Joseph F. Hetz
Reg. No. 41,070
Attorney for Applicants

BRINKS HOFER
GILSON & LIONE
P.O. Box 10395
Chicago, Illinois 60610
(312) 321-4719